

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FERRAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

January 16, 1991

Dr. James E. Crowley Director, Environmental Control BREAK: 19.4 Ciba-Geigy Corporation
444 Saw Mill River Road Ardsley, NY 10502

Superfund Records Center SITE: Ciba-Geigy OTHER: 651219

Ciba-Geigy Consent Order: RCRA Docket No., I-88-1088 RFI Proposal - Approval - Cranston, RI Facility

Dear Dr. Crowley:

The EPA has completed its review of Ciba-Geigy's RCRA Facility Investigation (RFI) Proposal, RFI Phase IA Report, and amended RFI Proposal submitted on April 2, 1990, October 24, 1990, and December 10, 1990, respectively. In accordance with Section II of the Consent Order, the Agency has approved the RFI Proposal (Phases IA & IB) submitted on December 10, 1990 under the condition that the following modifications are implemented.

- Minor changes to the December 10, 1990 amended RFI Proposal as discussed with Mark Houlday of Woodward-Clyde Consultants on January 10, 1991 must be incorporated. These changes are as follows:
 - Submittal of Figures 2-1 and 2-2 in Volume 1, Chapter 2, Section 2.
 - * A correction to Table 4-1 in Volume 1, Chapter 3, Section 4 and the same correction to Table ES-1.
 - * Further clarification of the monitoring program for AOC-13 as found in Volume 1, Chapter 3, Section 4, page 4-36 (first paragraph); and corrections on pages 4-36A & 4-47.
 - The submittal of Figure 4-2A in Volume 1, Chapter 3, Section 4.
 - The submittal of pages i & ii of the Organic Region I Data Validation Worksheets in Volume 2, Part A, Appendix B and the submittal of other proposed changes to this Appendix.



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- The recommendations outlined in Sections 6.3 & 6.4 of Volume 1 of the approved RFI Phase IA Report must be implemented as part of the approved RFI Proposal.
- The completion of the tasks in item two (2) above and their inclusion into the Phase I Interim Report and Phase II Proposal must be accomplished within the timeframes specified in item four (4) below.
- All Phase I field tasks, the Phase I Interim Report and Phase II Proposal shall be completed within the timeframes outlined in Volume I, Chapter 2, Section 5, Figure 5-2 (Tasks No. 5-13) of the approved RFI Proposal. EPA will expect to receive the Phase I Interim Report and Phase II Proposal thirty (30) weeks after receipt of this letter. Failure to meet this deadline may be cause for EPA to demand stipulated penalties as required by the Consent Order.

As a result of these conditions, a final RFI Proposal with all the changes and additions described above must be submitted to the EPA Project Manager by February 4, 1991.

If you have any questions, please contact Frank Battaglia at (617) 573-9643.

Sincerely,

Gary B. Gosbee, Chief

Frank Battaglia

MA & RI Waste Regulation Section

cc: Carol Wasserman, Office of Regional Counsel, EPA Mark Houlday, Woodward-Clyde Consultants